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March 7, 2003

BY HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Application of Qwest Communications International Inc. and U S
WEST, Inc.
CC Docket No. 99-272

Dear Ms. Dortch:

On behalf of Qwest Communications International Inc., enclosed are an original and three copies of a letter in the above-reference docket.

Please contact the undersigned with any communications regarding this submission.

Respectfully submitted,

HOGAN & HARTSON L.L.P.

By: Ghita J. Harris-Newton
Ghita J. Harris-Newton

Attorneys for Qwest Communications
International Inc.

Enclosure

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Sharon J. Devine
Associate General Counsel

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 7, 2003

Ms. Maureen F. Del Duca, Chief
Mr. Anthony Dale, Assistant Chief
Investigations and Hearing Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, N.W.
Washington, D.C. 20554

Re: Application of Qwest Communications International Inc. and U S WEST, Inc.,
CC Docket No. 99-272

Dear Ms. Del Duca and Mr. Dale:

In my December 3, 2002 letter in the above-referenced docket, Qwest Communications Corporation ("Qwest") voluntarily presented information relating to two matters: (1) four in-region interLATA private lines provided to Cable & Wireless in March 2002 in violation of company policy (that were terminated on December 9 and 10, 2002) and (2) two in-region interLATA dark fiber leases that continued after the Qwest-U S WEST merger closed (and that had been terminated earlier in 2002).

Qwest has been continuing its investigation of other matters potentially relevant to the above-referenced docket, and I now write to apprise you of additional information that Qwest has identified through this review. We describe matters that Qwest has recently uncovered and has corrected or is correcting. In addition, because Qwest is committed to proceeding in an open and forthright manner, and it wishes to resolve all potential enforcement issues, the information set forth below also includes old matters that were identified in the investigation, but that had been resolved long ago.

1. Private line services with one end in-region

Qwest has conducted an extensive review of database entries for circuits shown as having one or more in-region end points. This review has identified six additional in-region interLATA private line services that Qwest erroneously did not divest prior to the merger and that are still in service: four provided to Triumph Communications, one to Electric Lightwave, Inc., and one to Teleglobe. As it did in the case of the services provided to Cable & Wireless, Qwest is moving promptly to terminate the six additional services without disruption to customers. In addition, this review has identified a limited number of other instances where in-region interLATA private line services were not discontinued before the merger with U S WEST; all but one were

discontinued soon after or in any event long ago. Qwest nevertheless discloses these services in furtherance of its commitment to resolve openly all potential outstanding issues. Specifically, 17 private line services were divested or discontinued in the first few weeks of July 2000, 15 more were eliminated by the end of 2000, and one private line was discontinued on June 27, 2002.

Qwest also is taking further steps with respect to certain private lines provided to Triumph Communications. In June 2000 Triumph advised Qwest that, in Triumph's view, these particular private lines did not need to be divested because they were combined by means of cross-connect panels in Triumph collocation space on Qwest premises in Denver, so that the resulting service was between two out-of-region end points and, according to Triumph, carried only out-of-region to out-of-region transit traffic that did not terminate in-region. The parties in July 2000 entered into an agreement under which Triumph leased to Qwest the cross-connect panels so as to provide an end-to-end out-of-region service. However, Qwest is not satisfied that it has exercised sufficient control over the cross connection to be certain that in-region interLATA communication has never occurred. Additional steps are under consideration to address this matter.

2. Wholesale Transport for Operator Services

Qwest provides operator services from platforms in San Antonio, Texas and Albuquerque, New Mexico (the latter platform was in Denver, Colorado prior to early 2001). When customers place operator services calls, the calls are routed to one of the platforms for rating, billing, and customer service, and then released back to the originating switch for call termination. At divestiture, Touch America assumed responsibility for the in-region portion of Qwest's operator services business. Qwest began providing operator services support for Touch America's business from the platforms, including rating in-region calls at Touch America's rates, and providing customer support and billing in Touch America's name. Touch America traffic was routed to the platforms for this support activity, and then released back to Touch America at the originating switch location for termination.

Subsequently, in December 2001 Qwest network personnel made routing changes that caused traffic related to the divested in-region operator services to flow over WorldCom's network via an 8XX arrangement terminating at one of several out-of-region Qwest hubs. From there Qwest connected with the San Antonio or Albuquerque platforms (over internal Qwest facilities) for the operator service support activity on behalf of Touch America, after which the calls were terminated from the respective out-of-region Qwest hub over the Qwest network. At all times the platforms have rated, billed, and provided customer support to end users in Touch America's name and on its behalf under the relevant operator support services agreements between the parties. Effective February 26, 2003, Touch America's in-region operator services traffic was routed over Touch America rather than WorldCom facilities to the out-of-region Qwest hubs for support and termination. Separately, Qwest understands that currently Touch America is in the process discontinuing the provision of operator services in the region.

3. Dial Access Network Link

Qwest provides dial-up access for ISPs in its region. Touch America as the GSP carries in-region interLATA traffic from Qwest facilities to the Internet. Beginning in October 2002, Qwest has paid AT&T to provide an interLATA link between Verizon facilities in Sandpoint, Idaho and Touch America facilities in Spokane, Washington. The purpose of this link is to permit Qwest and Touch America as the GSP to provide dial-up Internet access capability to ISPs that want to serve Sandpoint and surrounding communities in northern Idaho. Qwest is continuing to review how to address this situation.

We would be pleased to discuss any of these matters at your convenience.

Sincerely yours,



Sharon J. Devine